

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)
)
 Plaintiff,) Case No. 3:21-cv-00923
)
 v.) District Judge Richardson
)
 THE LAMPO GROUP, LLC, et al,) Magistrate Judge Holmes
)
 Defendants.)

SECOND MOTION TO DISMISS BY DEFENDANT, DAVE RAMSEY

Defendant, Dave Ramsey, (“Ramsey”) by and through the undersigned counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves the Court to dismiss all claims filed against him in this case by Plaintiff, Brad Amos, with prejudice.

This is an employment case. Plaintiff was formerly employed by Defendant, The Lampo Group, LLC (“Lampo”). Ramsey is also employed by Lampo as the company’s CEO.

Plaintiff’s Amended Complaint (Doc. #21) inexplicably asserts claims for fraud and the Tennessee Human Rights Act, T.C.A. §4-2-101 et al (“THRA”) against Ramsey individually. As explained in Ramsey’s concurrently filed memorandum of law (Doc. #29), these claims are patently frivolous since they are unsupported by factual allegations, time-barred, and/or non-existent under applicable law.

Given the defects in Plaintiff’s claims against Ramsey, we respectfully ask the Court to dismiss all claims against Defendant Ramsey with prejudice, dismiss Defendant Ramsey as a party and award any other relief to Ramsey that the Court deems appropriate.

Respectfully submitted,

/s/Leslie Goff Sanders
Leslie Goff Sanders (TN #18973)
Daniel Crowell (TN #31485)
JACKSON LEWIS P.C.
CitySpace
611 Commerce Street
Suite 3102
Nashville, TN 37203
Telephone: (615) 565-1661
leslie.sanders@jacksonlewis.com
daniel.crowell@jacksonlewis.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that, on March 15, 2022, I caused the foregoing *Second Motion to Dismiss by Defendant, Dave Ramsey*, to be filed via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street
Brandon Hall
Cullen Hamelin
Lauren Irwin
THE EMPLOYMENT LAW AND CONSUMER LAW GROUP
street@eclaw.com
bhall@eclaw.com
chamelin@eclaw.com
lauren@eclaw.com

Attorneys for Plaintiff

/s/Leslie Goff Sanders
Leslie Goff Sanders (TN #18973)